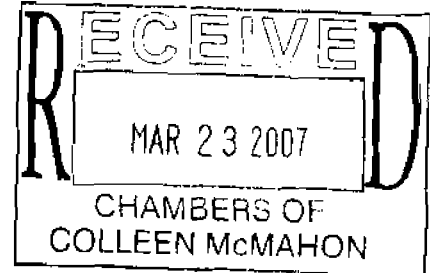
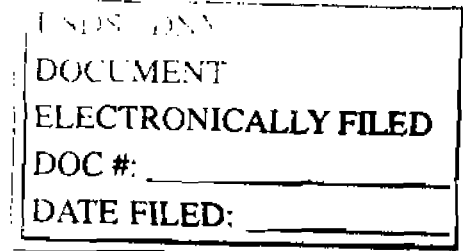


WILLIAM A. GERARD, ESQ.
Phone (845) 365-3121
Fax (845) 365-4036

March 23, 2007



Hon. Colleen McMahon
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, N.Y. 10601



Re: U.S. v HURGENS PIGNARD
Superseding Indictment No.: S1 06 Cr. 718 (CM)
Request for trial adjournment by proposed incoming counsel

Dear Judge McMahon:

This letter is written to request the opportunity to come into this case as the defendant's attorney to conduct the upcoming trial on his behalf.

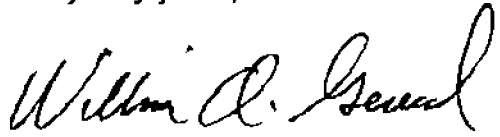
At the moment, Mr. Pignard is represented by Theodore S. Green, Esq., and it is my understanding that the trial is scheduled for April 16, 2007. At the defendant's request, his family has retained me to conduct the upcoming trial, however, I am not available on April 16, 2007, due to my engagement in a civil jury trial in Rockland County, N.Y.

It is therefore requested that the Court consider this as an application to adjourn the trial briefly to allow the proposed substitution of counsel, otherwise, it will not be possible for me to represent the defendant at trial.

I understand that the Court is scheduled to be in White Plains on Friday, March 30, 2007 and a conference is scheduled in this matter for Monday, April 2, 2007, and I am available on either date should the Court want me to appear.

Thank you for your courtesy and assistance in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "William A. Gerard". The signature is fluid and cursive, with a large initial "W" and a distinct "G" at the end.

William A. Gerard (5062)

cc.: Theodore S. Green, Esq.
Green & Willstatter
Attorney for defendant
Fax No. 914-948-8730

John Collins, Esq.
U.S. Attorney
Fax No. 914-682-1980

PLEASE REPLY TO THE FOLLOWING ADDRESS:
71 Woods Rd., P.O. Box 717, Palisades, N.Y. 10964

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

HURGENS PIGNARD,

Defendant.

APPEARANCE

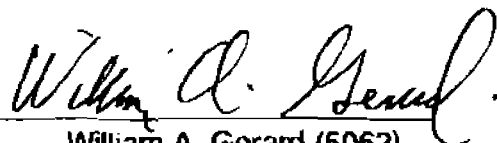
**Superseding Indictment
No. S1 06 Cr. 718 (CM)**

TO THE CLERK OF THIS COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE, that the undersigned hereby appears in this action on behalf of defendant, HURGENS PIGNARD, for all purposes and hereby requests that all papers be served upon the office of the undersigned at 71 Woods Rd., P.O. Box 717, Palisades, N.Y. 10964.

I certify that I am admitted to practice in this court.

Dated: Palisades, N.Y.
March 23, 2007



William A. Gerard (5062)
Attorney for defendant
HURGENS PIGNARD
71 Woods Rd., Box 717
Palisades, N.Y. 10964
Phone 845-365-3121
Fax 845-365-3121